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4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

ATTORNEYS

JUSTIN M. REILLY, ESQ.  
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA  
CATALINA ROMAN

**Via: ECF**

**May 15, 2025**

Hon. Judge Nusrat J. Choudhury  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: *Contreras v. Polar Property Services, Inc., et al.*; 2:25-cv-00418-NJC-AYS**

Dear Hon. Judge Choudhury:

I represent Defendants in this Fair Labor Standards Act case. Pursuant to Your Honor's April 1, 2025 Electronic Order, in which the Court set a briefing schedule for Defendants' Motion to Dismiss Plaintiff's Complaint, and Your Honor's Individual Rules, Defendants have submitted their unopposed Motion to Dismiss at ECF D.E. 14. Defendants complied with Your Honor's Scheduling Order and Bundling Rule, [Rule 5.2.6], by sending their motion papers to Plaintiff's Counsel on April 21, 2025 and filing the cover letter with the Court at ECF D.E. 13 [see Rule 5.2.7]. Plaintiff did not oppose the motion or file an Amended Complaint within the time set by Your Honor, nor did Plaintiff timely request an extension from the Court. Accordingly, Defendants submit that their Motion to Dismiss is unopposed and should be granted in its entirety. Pursuant to Rule 5.2.7, Defendants' unopposed motion papers include the following:

1. Defendants' Notice of Motion to Dismiss Plaintiff's Complaint;
2. Defendants' Memorandum of Law in Support of Defendants' Motion to Dismiss;
3. The Declaration of Keith E. Williams, Esq. in Support of Defendants' Motion to Dismiss;
4. Exhibit A, Complaint.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Keith E. Williams", is written over a light blue circular stamp or watermark.

Keith E. Williams, Esq.

cc: all counsel of record, via ECF.